

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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June 26, 2020

**VIA ECF**

Honorable Victor Marrero  
United States District Judge  
Southern District of New York  
40 Foley Square Room 2202  
New York, New York 10007

**Re: United States v. Joe Medina Serrano  
19 Cr. 351 (VM)**

Dear Judge Marrero,

On June 16, the Court granted Mr. Medina Serrano's request, made on consent, to modify his bail conditions to permit Mr. Medina Serrano to move from Arizona to Houston, Texas where he has secured work with Torres Construction fixing sewage systems. I have since been in communication with Pretrial Services-New York, who informs me that in order for Mr. Medina Serrano to be permitted to work, the Court also must modify his bail conditions so that he is subject to home detention. (He currently is subject to home incarceration.) Pretrial Services has no objection to the change.

Also, Mr. Medina Serrano's job will require him to be at varied and multiple jobsites during his workday. Pretrial Services also requires a Court Order permitting Mr. Medina Serrano to work at multiple jobsites.

Therefore, I respectfully request that the Court order the following two changes to the conditions of Mr. Medina Serrano's bail: (1) Mr. Medina Serrano is subject to home detention; and (2) Mr. Medina Serrano is permitted to work at various jobsites as part of his work fixing sewage systems with Torres Construction.

Respectfully submitted,

/s/

Julia Gatto  
Assistant Federal Defender

cc: Daniel G. Nessim, Esq. (via ECF)  
USPOs Jonathan Lettieri and Izlia Sanchez (via ECF)

**SO ORDERED.**

June 26, 2020

DATE



VICTOR MARRERO, U.S.D.J.